

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

SILENT COMMUNICATIONS, LLC,

Plaintiff,

v.

BLACKBERRY CORPORATION,

Defendant.

Civil Action No.: 6:22-cv-00252-ADA

JURY TRIAL DEMANDED

**DECLARATION OF MORGAN MAYNE IN SUPPORT OF DEFENDANT'S MOTION
FOR ATTORNEY'S FEES AND IN SUPPORT OF ITS APPENDIX A**

I, Morgan Mayne, declare and state the following:

1. I am an attorney with the law firm Baker Botts L.L.P., representing BlackBerry Corporation (“BlackBerry”) in this lawsuit. I am over the age of eighteen years, of sound mind, and am competent in all respects to make this Declaration. Except as expressly noted below, I have personal knowledge of the facts set forth herein. The facts set forth herein are true and correct.
2. Attached hereto as **Exhibit 1** is a true and correct copy of Defendant BlackBerry Corporation’s Letter to Plaintiff’s Counsel dated August 27, 2021.
3. Attached hereto as **Exhibit 2** is a true and correct copy of Defendant BlackBerry Corporation’s Letter to Plaintiff’s Counsel dated March 28, 2022.
4. Attached hereto as **Exhibit 3** is a true and correct copy of Plaintiff’s Amended Preliminary Infringement Contentions, dated May 26, 2022.
5. Attached hereto as **Exhibit 4** is a true and correct copy of Defendant BlackBerry Corporation’s Letter to Plaintiff’s Counsel dated July 11, 2022.
6. Attached hereto as **Exhibit 5** is a true and correct copy of Defendant BlackBerry Corporation’s email correspondence dated August 12, 2022.
7. Attached hereto as **Exhibit 6** is a true and correct copy of Defendant BlackBerry Corporation’s submission of discovery dispute, dated August 23, 2022.
8. Attached hereto as **Exhibit 7** is a true and correct copy of the Plaintiff’s submission of discovery dispute, dated August 26, 2022.
9. Attached hereto as **Exhibit 8** is a true and correct copy of Discovery Hearing Transcript, dated September 16, 2022.

10. Attached hereto as **Exhibit 9** is a true and correct copy of Defendant BlackBerry Corporation's email correspondence dated October 10, 2022.

11. Attached hereto as **Exhibit 10** is a true and correct copy of Defendant BlackBerry Corporation's email correspondence dated January 23, 2022.

12. Attached hereto as **Exhibit 11** is a true and correct copy of the Motions Hearing Transcript, dated February 14, 2022.

13. Attached hereto as **Exhibit 12** is a true and correct copy of Counsel's email exchange regarding changes to the dispute chart, dated July 15, 2022 through August 19, 2022.

14. Attached hereto as **Exhibit 13** is a true and correct copy of Plaintiff's Counsel's late disclosure of its portion of the discovery dispute, dated August 26, 2022.

15. Attached hereto as **Exhibit 14** is a true and correct copy of Plaintiff's Amended Infringement Contentions, dated October 7, 2022.

16. Attached hereto as **Exhibit 15** is a true and correct copy of Defendant BlackBerry Corporation's Rule 30(B)(6) Deposition Notice to Plaintiff, dated November 21, 2022.

17. Attached hereto as **Exhibit 16** is a true and correct copy of Defendant BlackBerry Corporation's First Set of Interrogatories (Nos. 1-4), dated November 21, 2022.

18. Attached hereto as **Exhibit 17** is a true and correct copy of Defendant BlackBerry Corporation's Rule 30(b)(1) Oral Deposition Notice to Carlos Gorrichategui, dated November 21, 2022.

19. Attached hereto as **Exhibit 18** is a true and correct copy of Defendant BlackBerry Corporation's Second Set of Requests for Production of Documents (Nos. 3-10), dated November 21, 2022.

20. Attached hereto as **Exhibit 19** is a true and correct copy of an email correspondence string regarding Jurisdictional Discovery delays by Plaintiff, dated November 21, 2022 through December 14, 2022.

21. Attached hereto as **Exhibit 20** is a true and correct copy of Plaintiff's Answer to Defendant's First Set of Interrogatories (No. 1-4), dated December 19, 2022.

22. Attached hereto as **Exhibit 21** is a true and correct copy of email correspondence string of Counsel for the parties dated January 24, 2023.

23. Attached hereto as **Exhibit 22** is a true and correct copy of Plaintiff's First Set of Interrogatories to Defendant, dated February 1, 2023.

24. Attached hereto as **Exhibit 23** is a true and correct copy of Plaintiff's First Set of Requests for Production to Defendant, dated February 1, 2023.

25. Attached hereto as **Exhibit 24** is a true and correct copy of BlackBerry's email correspondence dated February 9, 2023.

Pursuant to 28 U.S.C. § 1746, I, Morgan Mayne, declare under penalty of perjury that the foregoing is true and correct.

Executed on June 16, 2023, in Dallas, Texas.

/s/ Morgan Mayne
Morgan Mayne